

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES THORNTON,)	
Plaintiff)	
)	Civ. Action No. 05-10210- MEL
)	
v.)	
)	
)	
UNITED PARCEL SERVICE INC.,)	
Respondent)	

**UNITED PARCEL SERVICE INC.'S STATEMENT IN
PREPARATION FOR SCHEDULING CONFERENCE**

Pursuant to Local Rule 16.1, the following is United Parcel Service Inc.'s ("UPS") statement in preparation for the Scheduling Conference in the above referenced case:

I. Proposed Discovery Plan

- a. Initial disclosures due by July 11, 2005;
- b. All motions to amend or supplement shall be filed by July 15, 2005;
- c. All fact discovery shall be completed by ^{Nov.}~~October~~ 1, 2005;
- d. All expert witnesses on behalf of the plaintiff shall be designated in accordance with the Federal Rules of Civil Procedure and the Local Rules by November 1, 2005;
- e. All experts who may be witnesses on behalf of UPS shall be designated by December 1, 2005;
- f. All expert depositions shall be completed by January 1, 2006; and
- g. All dispositive motions shall be filed by January 15, 2006.

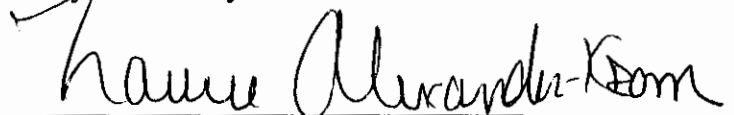
II. Certification

Please see separate certification that will be filed on behalf of UPS.

Certificate of Service
I hereby certify that on this day
a true copy of the above document
was served upon the attorney of
record for each party by mail/by hand.
Date: 6/1/05

United Parcel Service Inc.

By its attorneys



Hugh F. Murray, III, BBO# 557175

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Date: June 1, 2005